Supreme Court, U.S.
FILED
SEP 25 2015
OFFICE OF THE CLERK

No. 14-940

In the Supreme Court of the United States

SUE EVENWEL, *et al.*,

Appellants,

v.

GREG ABBOTT, IN HIS OFFICIAL CAPACITY AS GOVERNOR OF TEXAS, *et al.*,

Appellees.

On Appeal from the United States District Court for the Western District of Texas

BRIEF FOR *AMICI CURIAE* TEXAS SENATORS IN SUPPORT OF THE APPELLEES

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INTEREST OF *AMICI CURIAE*[1]

Amici Rodney G. Ellis, Sylvia Garcia, Juan "Chuy" Hinojosa, Eduardo A. Lucio, Jr., José Menéndez, José R. Rodríguez, Carlos I. Uresti, Kirk Watson, Royce West, John Whitmire, and Judith Zaffirini are Texas Senators. As such, they are directly interested in the way their districts are apportioned, as are their constituents. They file this brief because they believe equalizing districts by voters rather than people would seriously compromise their ability to provide vital constituent services to everyone they represent – voters and non-voters alike. They see assisting constituents with individual complaints about government and private entities as an essential part of their jobs as elected representatives, and they want to inform the Court about the magnitude and range of the constituent services they routinely perform. They respectfully submit that the Court should take their perspective into account when formulating the rule that will shape their districts.

While this brief focuses on the effects of Appellants' position on constituent services, *Amici* also more generally oppose the notion that only those eligible to vote should be counted in apportionment. Precedent, constitutional text, and the absence of workable standards and data needed to implement Appellants'

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[1] Pursuant to Supreme Court Rule 37.3(a), Appellants and Appellees submitted letters granting blanket consent to the filing of *amicus curiae* briefs in this case. No party authored this brief in whole or in part, and no persons or entities other than *amici curiae* or their counsel have made a monetary contribution to the preparation or submission of this brief.

proposal all support using population as the basis for districting. Since these positions will be developed by Appellees and others, however, *Amici* focus their attention on how voter-based apportionment would handicap their provision of vital constituent services.

SUMMARY OF ARGUMENT

Constituent service is a core function of elected representatives. As one Congressman put it, "I thought I was going to be Daniel Webster and I found that most of my work consisted of personal work for constituents." John R. Johannes, TO SERVE THE PEOPLE, CONGRESS AND CONSTITUENCY SERVICE 5 (U. Nebraska Press 1984). Texas Senators are no different. Together, *Amici* assist thousands of people with problems relating to Medicare and Medicaid, education, criminal justice, veterans' programs, and so on. Their work not only helps individual Texans, it leads to more effective and responsive government because constituents' complaints often prompt committee investigations, corrective legislation, and internal agency reform.

If Appellants prevail, however, accessibility and constituent service will suffer. Basing apportionment on voters rather than population would cause *Amici's* largely urban, low-income districts to grow as they absorb more non-voters. More districts would be composed of suburban and rural residents, while fewer Senators would represent more poor people, children, and non-citizens. These are precisely the people whose greater social needs generate more requests for help from elected officials. Forced to serve larger, more disadvantaged districts, *Amici* could not provide the same level of constituent service. The Court should

take this inevitable harm into account in deciding this appeal.

ARGUMENT

I. Constituent Service is a Fundamental Aspect of Representation and Serves Important Individual and Governmental Interests

There is broad agreement among legislators, courts, scholars, and citizens that elected representation today does not simply consist of crafting and voting on legislation – it also entails ongoing and effective constituent service. In fact, some analysts believe this has become legislators' primary job in an era when more and more people interact with the administrative state. Moreover, constituent service yields crucial benefits to individuals and society as a whole.

1. Before the United States came into being, Edmund Burke had already attracted attention for his thinking about the legislator's duty to his constituents. As he "explained in his famous speech to the electors of Bristol, a representative owes constituents the exercise of his 'mature judgment,' but judgment informed by 'the strictest union, the closest correspondence, and the most unreserved communication with his constituents.'" *McCutcheon v. F.E.C.*, 134 S. Ct. 1434, 1461-62 (2014) (quoting *The Speeches of the Right Hon. Edmund Burke* 129–130 (J. Burke ed. 1867)). When voting, representatives should not be mere conduits for their constituents' wishes, but constituents' "business" deserves a legislator's "unremitting attention." Edmund Burke, *Speech to the Electors of Bristol, November 3, 1774*, *in* THE FOUNDERS' CONSTITUTION

(Phillip B. Kurland and Ralph Lerner, eds., U. Chicago Press and Liberty Fund), http://press-pubs.uchicago.edu/founders/documents/v1ch13s7.html.

In the United States today, Burke's vision is the norm. Some commentators believe "legislators devote *most* of their time and energy to constituent service, rather than to evaluation of legislative policy options, because constituent service is more important to a legislator's prospects for reelection." Richard J. Pierce, *The Role of Constitutional and Political Theory in Administrative Law*, 64 TEX. L. REV. 469, 491 (Nov. 1985) (emphasis added). Indeed, "there is a virtual consensus among political scientists today that 'casework,' or individual constituent services, constitutes the average legislator's principal function." John Hart Ely, *Standing to Challenge Pro-Minority Gerrymanders*, 111 HARV. L. REV. 576, 588 (Dec. 1997). Political scientist John R. Johannes, who conducted an important study of constituent service in Congress three decades ago, concluded that "Congress – or, more properly, each individual congressional office – has become the ombudsman of the American political system.... Constituency service has increased dramatically in the past two decades." Johannes, *supra* at 225.

Legislators now see accessibility to constituents and helping them with individual problems as an indispensable part of their work. "Members themselves are among the strongest boosters of constituent service. They and other proponents of casework maintain that the ombudsman role is basic to the job of being a member of Congress – an essential aspect of what it means to 'represent' one's

constituents." Ronald M. Levin, *Congressional Ethics and Constituent Advocacy in an Age of Mistrust*, 95 MICH. L. REV. 1 n. 76 (Oct. 1996). This is confirmed in innumerable accounts from legislators themselves. Former House Speaker Tip O'Neill described learning this lesson from the legendary Boston pol Michael Curley:

> In 1937, when I was a freshman in the Massachusetts state legislature, Curley, who had just completed his term as governor, invited me to his office and gave me some excellent advice on dealing with constituents. "Over the years," he said, "hundreds and hundreds of people will come to your office and ask you for favors. Some of these favors may be great, and some of them may be small. Some may be important, and some may be trivial. Some will be easy, some will be difficult.
>
> "But always remember, for the person who comes to you, that favor is the most important thing in the world. If he could take care of it himself, he wouldn't be here. So treat them all alike and try to help everybody – no matter how big or how small the problem is."
>
> I was inclined in that direction anyway, and I followed Curley's policy all the way up the ladder.

Thomas P. O'Neill, Jr. with William Novak, MAN OF THE HOUSE 30 (Random House 1987).

These sentiments, shared widely in Congress, were echoed by O'Neill's successor, former Speaker Jim Wright of Texas:

> For many millions of private citizens, their elected representative is the only person whom they remotely know in the federal government. He is their only intercessor when they encounter difficulties. This particular relationship between a congressman and the individual constituent, struggling for opportunity, is a very sacred one, not to be despised. It is, in fact, essential if we are to keep government accessible and to keep government human.

Incumbency Advantage and Accountability: The Question of Campaign Finance, Congressional Perquisites, and Constituent Service, 23 CUMB. L. REV. 61, 67 (1993) (remarks of Jim Wright).

Nor is this view confined to Democrats. Former Senator Strom Thurmond, known for especially responsive constituent service, believed that legislators "owe it to the people who send us here to help them navigate the sometime baffling maze of the federal bureaucracy.... Constituent service is not an antiquated notion, it is part and parcel of why we are here." Strom Thurmond, *Statement by Senator Strom Thurmond*, LEADERS LECTURE SERIES (2002), www.senate.gov/artandhistory/history/common/generic/Leaders_Lecture_Series_Thurmond.htm. As another Republican senator put it: "If there weren't 535 people in Washington to come to the rescue of the average citizen, only God knows what more lashes those bureaucrats would lay on the backs of people. Why, those people in the agencies make life impossible." Johannes, *supra*, at 16. In the 2014 campaign, Kentucky Senator and now Senate Majority Leader Mitch McConnell touted his service for a

constituent whose daughter had been abducted in a custody dispute. *See* Juana Summers, *Constituent Services Give Voters Something to Remember* (NPR radio broadcast Oct. 28, 2014), *available at* http://www.npr.org/2014/10/28/359615965/constituent-services-give-voters-something-to-remember.

Like legislators, this Court has also recognized the centrality of constituent service to the task of the modern elected representative, calling it "the everyday business of a legislator." *McCormick v. United States*, 500 U.S. 257, 272 (1991). Over forty years ago, the Court noted that members of Congress take on "a wide range of legitimate 'errands' performed for constituents, the making of appointments with Government agencies, assistance in securing Government contracts," and the like. *United States v. Brewster*, 408 U.S. 501, 512 (1972). "The range of these related activities has grown over the years. They are performed in part because they have come to be expected by constituents, and because they are a means of developing continuing support for future elections.... [T]hese are entirely legitimate activities." *Id.* Lower courts have repeatedly made the same point.[2]

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[2] See, e.g., *United States v. Judicial Watch, Inc.*, 371 F.3d 824, 830 (D.C. Cir. 2004) (quotation omitted) ("our political system accepts and even applauds" constituent service); *Williams v. United States*, 71 F.3d 502, 507 (5th Cir. 1995) ("Besides participating in debates and voting on the Congressional floor, a primary obligation of a Member of Congress in a representative democracy is to serve and respond to his or her constituents"). *Newell v. Brown*, 981 F.2d 880, 886-87 (6th Cir. 1992) (in writing correctional officials, congressman "was simply providing the kind of 'constituent service' that every member of Congress renders routinely upon request"); *Calderon v. City of Los Angeles*, 481 P.2d 489, 494 (Cal.

Constituent services have also been held to constitute "official acts" under the federal bribery law governing members of Congress. *See United States v. Jefferson*, 674 F.3d 332, 337, 351-57 (4th Cir. 2012).

2. Not simply a tool to promote reelection, constituent service is a boon to individuals and government in general. On the most basic level, it enables people who need help to obtain necessary information and qualify for crucial services. For them, an elected representative's intervention is the main and most direct benefit government can provide: "Casework by legislators fits the American system of government. Representation – literally a 're-presentation' – of constituents occurs where it affects them in a most practical fashion... For many people, asking help on personal problems is their first and only direct contact with Congress." Johannes, *supra*, at 225.

Not surprisingly, then, "[s]tudies have consistently shown broad public support for congressional casework." Levin, *supra*, at 32. Effective constituent service may also boost public confidence in government. In Johannes's study, "a surprisingly large number of congressmen and their aides [we]re convinced that casework prevents public cynicism about government... 'People are so grateful just to hear a response. There's no more important function for a congressional office than to give constituents the feeling that they have access to government.'" Johannes, *supra*, at 184.

1972) ("Furthermore, much of a legislator's time is devoted to providing services and information to his constituents, both voters and nonvoters").

Beyond helping individuals resolve discrete problems, constituent service improves how government functions. Complaints alert representatives to problems in government and thus help the legislature fulfill its oversight role. "According to the vast majority of members and staffers interviewed, case and project work provides low-cost, generally accurate intelligence, along with a good dose of motivation." Johannes, *supra*, at 162. As one staffer put it: "You find out what's happening in the agencies. We don't have time to read the *Federal Register*, so cases tell us what's going on. Even one case can open up a whole world." *Id.* at 163. A "representative body... is meant to be the eyes and the voice, and to embody the wisdom and will of its constituents. Unless Congress have and use every means of acquainting itself with the acts and the disposition of the administrative agents of the government, the country must be helpless to learn how it is being served." Woodrow Wilson, *Congressional Government* 303 (1885).

Armed with information from constituents, legislators can act to bring about broader change. They can begin investigations, hold hearings, and compel testimony from agency officials or private citizens that expose shortcomings in administration or gaps in existing law. They can devise new legislation targeting problems revealed by constituents, or change their votes on bills already pending. "Several representatives and staffers, for example, commented that casework – and unusually good or bad experiences with agencies on cases – had affected floor voting on bills and decisions to cosponsor." Johannes, *supra*, at

165. Legislators can also complain directly to agencies, prompting internal reform:

> Finally, as a result of incoming congressional complaints and requests, departments and agencies might change regulations or procedures, conduct their own internal oversight, or, at the least, become more aware of problems and be more careful when similar cases arise. The process of dealing with "congressionals," moreover, might help sensitize bureaucrats to the human consequences of their rules, regulations and operations.

Id. at 162. . All these responses can improve governmental performance, benefitting everyone.

II. Texas Senators Devote Much of Their Time to Constituent Service and Consider it a Core Responsibility of Representation

These facts about constituent service apply as fully to the Texas Senate as to any American legislative body. *Amici* and all members of the Texas Senate spend much, if not most, of their time, energy, and staff resources on responding to requests for constituent service. Their efforts benefit individual residents as well as Texas as a whole.

The mean population of Texas' 31 Senate districts is approximately 811,000, with the smallest district containing 778,341 people and the largest 843,567. *See* Texas Legislative Council, *Texas Redistricting, District Population Analysis With County Subtotals, Senate Districts, Plan S172* (March 17, 2015), ftp://ftpgis1.tlc.state.tx.us/District/Viewer/Senate/PlanS172r100.pdf. Each Texas Senator receives the same amount to hire

staff-members regardless of population disparities among districts, and each Senator employs several staffers.[3] Senators allocate the duties of staff-members differently, assigning some to full-time constituency work, some to legislative work only, and some to both. But all *Amici* have multiple staff-members handling constituent complaints. State and federal agencies employ liaisons to respond to inquiries from legislators' offices.

Amici and other Texas Senators are inundated with requests from constituents for help with various individual problems. The Texas legislature meets once every two years in sessions lasting no more than 140 days, plus occasional 30-day special sessions called by the governor. *See* TEX. CONST. art. III §§ 5, 24, 40. *Amici* together receive thousands of constituent inquiries during each of these two-year cycles. Particularly when the Senate is not in session – typically sixteen to eighteen months at a time – most of *Amici's* staffers work on constituent services. One *Amicus* Senator estimates that 70% of her and her staff's time when the Senate is not meeting is spent answering, investigating, and trying to resolve constituent complaints. *Amici* devote such a large portion of their time to constituent service because they see it as a central part of their duty as representatives.

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[3] *See* Tex. Senate Resolution 1075, § 7(b), June 1, 2015, *available at* http://www.legis.state.tex.us/tlodocs/84R/billtext/html/SR01075F.htm (Senators each budgeted $38,000/month for staff and travel while Senate out of session); Tex. Senate Resolution 1, § 10(a), January 13, 2015, *available at* http://www.legis.state.tex.us/tlodocs/84R/billtext/html/SR000001F.htm (Senators each budgeted staff salaries of $40,000/month while Senate in session during 2015).

As one *Amicus* Senator puts it: "If you don't demonstrate that you're responsive and will take care of them, they lose faith in government."

Moreover, as Democrats representing mostly urban districts, *Amici's* constituents are disproportionately people with lower incomes and new immigrants. These groups have greater social needs and more interactions with government agencies, which in turn generate more requests for help from Senators. This additional level of demand from constituents who need more social services is not unique to Texas. *See* Samuel Issacharoff, *Supreme Court Destabilization of Single Member Districts*, 1995 U. CHI. LEGAL F. 205, 231 (1995) (quoting MALCOLM E. JEWELL, REPRESENTATION IN STATE LEGISLATURES 145 (University Press of Kentucky 1982)) ("Thus, as a general rule, 'the demand for constituent services is greater in districts that are below average in socioeconomic terms'").

Amici provide constituent services to people without regard for or knowledge about whether they vote, or their partisan affiliation. They do the same irrespective of citizenship – as has also been documented more generally. *See* Matthew S. Mendez, *Who Represents the Interests of Undocumented Immigrants? A Study of State Legislators* (Dec. 15, 2013), *available at* http://ssrn.com/abstract=2592754 (state legislators, including members from Texas, provide services to undocumented immigrants in their districts without regard to citizenship, albeit at potentially lower levels of responsiveness, and Hispanic legislators generally provide equal service to aliens).

The problems for which *Amici's* constituents seek help involve health care programs, criminal justice and

incarceration, immigration rules, education, child support and custody, state and federal programs for veterans, services for elderly and disabled people, workers' compensation and unemployment benefits, taxes and government fees, obtaining licenses, neighborhood nuisances, environmental complaints, grant applications, and more.

For example, difficulties with Medicare and Medicaid are a recurring source of requests. Constituents call Senators because they have trouble enrolling, are unsure about eligibility, are denied coverage, seek home healthcare for parents, need replacement cards, and so on. *Amici's* staffers provide information about how the programs work and, when needed, communicate with state and federal administrative personnel to obtain information and try to resolve constituent complaints. Other typical health-related inquiries concern state-provided rehabilitation services, homecare for aged and disabled residents, medical and mental health care and counseling for veterans, and vaccination.

Constituents also frequently call *Amici* Senators' offices seeking help with problems related to criminal justice and family members' incarceration. They may complain about what they perceive to be an unjustified stop or arrest, wrongful or excessive charges, poor treatment by police officers or jail employees, the inability to obtain state funds set aside for victims of crime, and so on. As for incarceration, requests seek aid in arranging transfers of prisoners to facilities closer to home, obtaining parole, securing better medical care or treatment for substance abuse, or changing the conditions of confinement in some other

way. *Amici's* staff-members work with the Texas Department of Criminal Justice Ombudsman's office or other applicable law enforcement agencies to investigate the issue and ensure appropriate personnel respond to constituents.

Requests regarding education and child welfare are frequent, too. Parents call Senators' offices with questions and complaints about how and where to enroll children in school, unjustified disciplinary measures, lax responses by teachers and administrators to bullying, immigration- and language-related issues, obtaining special education for children with disabilities, truancy charges, and the like. Child custody and protection inquiries are also common; parents approach *Amici* about actions taken by estranged spouses, Texas Child Protective Services caseworkers, family court judges, and law enforcement officers. *Amici's* staffers provide relevant information and often act as temporary intermediaries with school and state officials.

Aside from responding to specific complaints, *Amici* also affirmatively reach out to residents and help provide needed community services. For example, some *Amici* Senators participate in back-to-school events in their districts with school officials, private sector partners, and nonprofit organizations. Volunteers distribute backpacks and other supplies; students get vision tests, dental exams, and immunizations; and parents receive important information about school. Over 1,000 children attend some of these events. *Amici* are often asked to and do take part in similar kinds of community outreach programs at Thanksgiving, Christmas, and other

holidays. They also help local nonprofit groups in their districts apply for grant funding and coordinate with state agencies.

Amici frequently use information acquired in helping constituents to propose legislation, hold hearings, prod state and local officials, and try to effect broader change. In one case, an *Amicus* Senator received repeated constituent complaints about bars that appeared to be unlicensed but served alcohol in residential neighborhoods. In response, she devised a bill to criminally penalize unauthorized users of Texas Alcoholic Beverage Commission permits, whereas previous law only covered existing permit-holders who let unlicensed vendors falsely display their permits. The bill passed the legislature in the 2015 session and was signed into law by the governor. *See* TEXAS LEGISLATURE ONLINE, *SB 367*, www.legis.state.tx.us/BillLookup/Text.aspx?LegSess=84R&Bill=SB367.

In another example, the same Senator received several complaints about poor service and undrinkable water provided by a privately owned water company in a low-income part of her district just outside Houston's city limits. The complaints led the Senator and a House member to organize a community forum for affected customers. Their staffers then assisted residents in preparing a complaint to the Texas Public Utility Commission, which is now adjudicating the matter.

Overall, *Amici* provide vital assistance to individual constituents and thereby improve government in general – and they do so without regard to whether the people they help are voters. Their work flows from their conviction that accessibility to the public and

constituent service lie at the heart of their duty as elected representatives.

III. Using Voter Status as the Basis for Equalizing Districts Would Limit *Amici's* Ability to Serve Their Constituents

Amici's constituents will suffer if Texas is forced to apportion Senate districts according to voter status rather than population. With more constituents packed into their districts, particularly those with especially acute social needs, *Amici* will not be able to deliver the same level of service and responsiveness – that is, the same basic quality of representation – to residents.

The districting rule proposed by Appellants would result in fewer and more populous urban districts composed of a greater proportion of non-voting, low-income residents and new immigrants. People with lower incomes vote in lower numbers than affluent people. *See* Sean McElwee, *Why the Voting Gap Matters*, DEMOS (Oct. 23, 2014), www.demos.org/publication/why-voting-gap-matters. Non-citizens, children, and people convicted of crimes whose voting rights have not been restored can't vote at all. All these groups tend to be concentrated in urban areas. *See, e.g.*, Richard L. Hasen, *Only Voters Count?*, SLATE (May 26, 2015), www.slate.com/articles/news_and_politics/jurisprudence/2015/05/evenwel_v_abbott_supreme_court_case_state_districts_count_voters_or_total.html. Thus, adopting Appellants' proposed rule would result in more rural and relatively affluent districts while fewer members represent poorer, urban, non-voters, who will be invisible when it comes to apportionment. *Amici's* districts would likely grow significantly beyond

their current average of 811,000 constituents. As the California Supreme Court recognized: "A district which, although large in population, has a low percentage of registered voters would, under a voter-based apportionment, have fewer representatives to provide [constituent] assistance and to listen to concerned citizens." *Calderon*, 481 P.2d at 493.

The effect of more populous districts filled with greater numbers of people with unmet social needs would, inevitably, be a lower level of accessibility and service delivered to all constituents in those districts. *Amici* would have to hire more staff-members to accommodate the increased population, especially considering that the new people would be more likely to need and seek their help. Yet every Texas Senator is budgeted the same staff resources regardless of the size of her district. *See* n. 3, *supra*. Nor, frankly, is there much prospect of that changing in order to better serve non-voting members of the public in Democratic districts, given Democrats' minority party status in the Texas Senate. *See, e.g., Veith v. Jubelirer*, 541 U.S. 267, 363 (2004) (Breyer, J., dissenting) ("the party that controls the process has no incentive to change it").[4] Consequently, *Amici* would likely have to divide the same resources they get now among more constituents, diminishing the service they and their staffs can provide. *See, e.g., Garza v. County of Los Angeles*, 918 F.2d 763, 774 (9th Cir. 1990) ("Residents of the more populous districts thus have less access to their elected

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[4] In the Texas Senate, Republican Senators outnumber Democrats 20 to 11. *See* Legislative Reference Library of Texas, *Legislators and Leaders, Membership Statistics for the 84th Legislature*, www.lrl.state.tx.us/legeleaders/members/memberstatistics.cfm.

representative. Those adversely affected are those who live in the districts with a greater percentage of non-voting populations"); *see also* Appellees' Brief at 57 (apportioning by population equalizes "demand for government services" and "ensur[es] that elected officials are not tasked with representing a substantially greater number of constituents than other officials"). Alternately, *Amici* could try to shift staff from policy to constituent service duties, but that would only compromise the legislative side of their representation.

Appellants more or less acknowledge the reality that their proposed rule would reduce the level of constituent service, but they claim it doesn't matter. Asserting that "representational equality is not an interest on par with the fundamental right to an equal vote," they recognize that constituents will petition their representatives but argue that there is no right to anything in response: "A constituent is entitled to mail, call, or visit his elected representative's office. But he has no right to have that letter opened, call returned, or have his meeting request accepted – even if the representative reads the letters, answers the calls, or meets with other constituents of the district." Brief for Appellants 40-41.

Yet whether constituent service is conceived of as a "right" or simply as a fundamental part of modern representation, *Amici* can attest that fewer letters opened, calls answered, and meetings convened will have tangible, negative impacts on the people who most need their Senators' help. It will mean fewer people who obtain necessary healthcare, fewer corrections of government overreach for local businesses, fewer

veterans able to take advantage of available counseling and rehabilitation, fewer disabled students transferred to more appropriate classrooms, fewer nuisances and environmental violations abated, fewer investigations and hearings to address issues raised by constituents, and fewer bills translating local sentiment into systemic change. "In the words of a former Senator, 'If Congressmen don't do it, nobody will; there's a lot of people out there who need help.'" Johannes, *supra*, at 16. More amorphously perhaps, but no less important, the public's faith in government can only suffer. Put simply, *Amici's* more numerous constituents will end up getting less representation from their representatives. The Court should strive to avoid that result.

"Crucial though voting is as a method of participation in representative government, access to elected officials is also an important means of democratic expression – and one that is not limited to those who cast ballots." *Calderon*, 481 P.2d at 259 (citations omitted). In weighing what Judge Kozinski described as the "apparently conflicting principles" of "equal representation" and "electoral equality," *Garza*, 918 F.2d at 781 (Kozinski, J., dissenting), the Court should consider the concrete and harmful effects on Texans in *Amici's* districts that would flow from adoption of Appellants' position.

CONCLUSION

The Court should affirm the district court's decision.

Respectfully Submitted,

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